

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KISON PATEL,)	Case No. 15-C-8174
individually and on behalf of)	
a class of similarly situated people,)	Judge John Z. Lee
)	
Plaintiff,)	
)	
)	
v.)	
)	
AT&T SERVICES, INC. and ILLINOIS)	
BELL TELEPHONE COMPANY,)	
)	
Defendants.)	

**JOINT MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION
SETTLEMENT**

NOW COMES the Plaintiff Kison Patel (“Patel”) and the Defendants AT&T Services Inc. and Illinois Bell Telephone Company (collectively “AT&T”), and jointly move the Court pursuant to Fed. R. Civ. P. 23 for preliminary approval of their class action settlement agreement.

1. After engaging in discovery, Patel and AT&T entered into a preliminary agreement to settle this case on a class-wide basis. After informing the court that a class-wide settlement on the material terms had been reached, the parties worked on finalizing the written settlement agreement, including the proposed notice to the class, claim form and the methods by which class members can submit a claim, all of which are attached to the memorandum in support of this motion as Appendix 1 and its accompanying exhibits. The proposed preliminary approval order is attached the settlement agreement as Exhibit E, and will be submitted electronically to the Court to Proposed_Order_Lee@ilnd.uscourts.gov.

2. For the reasons set forth in the memorandum in support of this motion, it is appropriate for the Court to preliminarily approve the settlement, to preliminarily certify the settlement class for the purposes of settlement, and to direct notice to be issued to the class members.

WHEREFORE, the parties respectfully request that this Court enter an ORDER substantially in the form of Exhibit E to the settlement agreement preliminarily approving their class action settlement in this case.

RESPECTFULLY SUBMITTED this 21st day of July, 2016

ATTORNEYS FOR PLAINTIFFS

By: /s/ Curtis C. Warner

Curtis Warner
Warner Law Firm, LLC
350 S. Northwest HWY, Ste. 300
Park Ridge, IL 60068
(847) 701-5290
Email: cwarner@warnerlawllc.com

ATTORNEYS FOR DEFENDANTS

By: /s/ Hans J. Germann

John E. Muench
Hans J. Germann
Kyle J. Steinmetz
Mayer Brown LLP
71 S. Wacker Dr.
Chicago, IL 60606
jmuench@mayerbrown.com
hgermann@mayerbrown.com
ksteinmetz@mayerbrown.com